

November 13, 2001  
Dr. William Stokes, Director  
NICEATM  
NIEHS  
MD EC-17  
P.O. Box 12233  
Research Triangle Park, NC 27709

In. re: Report of the International Workshop on In Vitro Methods for  
Assessing Acute Systemic Toxicology, NIH Publications 01-4499/01-4500

Dear Dr. Stokes,

I am writing on behalf of the National Anti-Vivisection Society (NAVS), a non-profit educational organization that promotes the use of alternatives to animals in research. The National Institute of Environmental Health Science's recent workshop, which explored the feasibility of replacing animal tests with in-vitro cell culture tests, was of great interest to NAVS and its 75,000 supporters.

We fully support the elimination of the LD-50 animal test for determining the toxicity of substances. There have been in vitro tests for such testing for several years and the continued sacrifice of animal life when a valid alternative exists is indefensible. Animal tests have never had to go through the stringent validation process accorded to in vitro tests. While a partial implementation of the use of in vitro testing is a definite step forward, many of these tests have been used by industry for many years. The strict requirements for acceptance and validation of in vitro tests, but not animal tests, appear to convey a biased approach to the outside observer.

The National Anti-Vivisection Society applauds the efforts of scientists willing to consider the replacement of animals in toxicity testing and we encourage the widespread replacement with in vitro testing as soon as possible.

Thank you for the opportunity to comment.

Sincerely,

Marcia Kramer  
Director of Legal/Legislative Programs  
The National Anti-Vivisection Society